

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MENDI YOSHIKAWA, Individually and
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

EXXON MOBIL CORPORATION,
DARREN W. WOODS, ANDREW P.
SWIGER, and DAVID S. ROSENTHAL,

Defendants.

Civil Action No. 3:21-cv-00194-N

**DEFENDANTS' UNOPPOSED MOTION
FOR LEAVE TO PROCEED WITHOUT LOCAL COUNSEL**

In accordance with Local Rule 83.10(a), Defendants Exxon Mobil Corporation, Darren W. Woods, Andrew P. Swiger, and David S. Rosenthal (collectively, "Defendants") respectfully request leave to proceed without local counsel. Local Rule 83.10(a) requires that attorneys who are not residents in the district associate with local counsel who either resides or maintains her principal office within this district and within 50 miles of the courthouse.

Michelle Davis currently resides within the Northern District, Fort Worth Division, in Granbury, Texas, and approximately 60 miles from the courthouse. Defendants respectfully submit that Ms. Davis's current residence is sufficiently close to the courthouse to allow her to be readily available for court appearances or as otherwise required by the Court.

Accordingly, Defendants seek leave to litigate this matter with Ms. Davis and avoid the additional expense of engaging local counsel within the Dallas Division.

Dated: March 22, 2021

Respectfully submitted,

/s/ Noelle M. Reed

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Attorneys for Defendants Exxon Mobil

Corporation, Darren W. Woods

Andrew P. Swiger, and David S. Rosenthal

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for the plaintiff on March 19, 2021 regarding this Motion. Counsel for the plaintiff does not oppose the relief requested.

/s/ Kenneth P. Held

Kenneth P. Held

CERTIFICATE OF SERVICE

I hereby certify that on March 22, 2021, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court, which will send notification of such submission to the counsel who have registered with the Court.

/s/ Noelle M. Reed

Noelle M. Reed